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October 2, 2020

VIA ECF

The Honorable Joseph A. Dickson United States District Court District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Room 4015 Newark, NJ 07101

Re: White et al. v. Samsung Electronics America, Inc. et al., 2:17-cv-01775-MCA-JAD

Dear Judge Dickson:

We represent Defendant Sony Electronics Inc. ("SEL") in the above-captioned matter but write on behalf of all parties including SEL, Samsung Electronics America, Inc. and Plaintiffs.

Your Honor's Text Order of September 28, 2020 [DE #166] stated, "The parties shall meet and confer and, on or before 10/2/20, shall submit a proposed schedule for the remaining briefing on Defendants' Arbitration Motions."

The parties have conferred. We have agreed upon a proposed schedule to accommodate the request of Plaintiffs' counsel, who due to severe illness is unable to litigate the case at this time, as Plaintiffs' counsel told the Court during the August 12, 2020 conference and in DE #156. All parties propose the following schedule:

- Plaintiffs will have until January 8, 2020 to Oppose the Sony Arbitration Motion and the Samsung Arbitration Motion. Plaintiffs shall do so by sending their respective Oppositions to each Defendant, not by filing.
- Sony and Samsung both have until February 15, 2020 to Reply in support of their respective Arbitration Motions.
- Sony and Samsung shall both then file on the docket their respective Arbitration Motion; immediately thereafter, Plaintiffs shall file their Oppositions; and immediately thereafter, the Defendants shall file their Replies.

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Please do not hesitate to contact me in the event the Court has any questions.

Sincerely yours,

/s/ Mark S. Melodia

Mark S. Melodia

MSM:tl

cc: All parties (via ECF)